



WASTE MANAGEMENT SECTION

Newsletter

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Changes Within

New Staff

Andrea Vickory
Solid and Hazardous Waste Specialist, Editor

Please join us in welcoming Janet Handy as our new Administrative Support personnel. Janet has been with the Solid Waste Program since November.

With turnover in personnel lately we felt that it was time to remind you of "who does what" and their phone number so you can get to the person you need easier. Inside this newsletter is a flowchart that has phone numbers and job duties. This should assist you in finding the right person to help you with any concerns that you may have.

Why have an Operations and Maintenance Plan?

It's a Good Thing

Tim Stepp
Solid and Hazardous Waste Specialist, Regulatory Program

A facility's Operations and Maintenance Plan (OMP) contains a complete description of all the approved procedures implemented at each site. The OMP provides a concise and consolidated record of the ongoing site-specific agreements for operating each landfill in an environmentally sound manner. It is a template of the specific methods used to meet many of the performance or prescribed criteria required in the state and federal solid waste rules—in each case it specifies how compliance is currently achieved, gives schedules for the sequence of tasks involved, and lists the documentation required. Both operators and regulators should use it as a yardstick to routinely evaluate and discuss operational compliance, thus a copy of it must be available on site at all times. Adherence to the requirements of an OMP is a significant part of the overall facility performance.

Changes or improvements in operations should be accurately reflected in updates to the OMP, each of which must also be approved by the Department. Therefore, any adjustments in operations or maintenance that affect compliance must be recorded in the OMP prior to their use on site. An accurate, complete, and up-to-date OMP provides a valuable reference to regulators or operators on the waste

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Licensing Concerns

Dealing with DEQ

Mike DaSilva
Licensing Program Manager

When dealing with the DEQ there are number of subjects we get questions about and a few little things that could be done to make interaction easier for all of us. We intend to include these in newsletters from time to time and would welcome any suggestions you have that could help things go more smoothly.

Correspondence

Whenever you write to the Department it is very helpful if you can include a subject line with your facility number and the topic of the letter. This would assure proper internal routing of the correspondence and help us avoid filing errors.

Fee payment

If it would cut down on your tracking and bookkeeping efforts it is OK to send in more than one quarter's fees at a time. There are several benefits to paying annually.

- You don't have to cut off the coupon to accompany payment (if you send the entire year's payment, just send the entire sheet),
- You only have to process one check instead of four, and
- You don't run the risk of losing the partial sheet with the remaining coupons.

Facility annual reports

When you list your facility on the annual report, it is not necessary for you to report container sites. We only need information on the facilities that we must regulate. It is important to be as accurate as possible when reporting the volume of material accepted at your facility. Annual tonnage fees for the upcoming year are assessed based on the tonnage reported the prior year. For example, there are two classes of transfer station based on tons – less than 10,000 tons per year and over 10,000 tons per year. If your annual report shows more than 10,000 tons, you are automatically switched to the larger class and your fee for the upcoming year will increase.

Composting

Composting is permissible within the boundaries of

Class II facilities there are no additional fees. We do need to have a detailed description of the new operation; so, the only thing you have to do is get departmental approval of a modification to your operations plan. Composting at other sites may be done under the small composter exclusion if:

- The operation is under two acres of active working area,
- Accepts yard waste only,
- Accepts less than 10,000 cubic yards annually, and,
- Produces less than 1,000 tons of compost annually.

Small compost operations that receive waste from more than one source must be registered with the Department and must conduct operations in a manner approved by the Department. If a proposed composting operation isn't at a Class II facility or doesn't meet the exclusion, it must be licensed as a large composter.

Daniels, Sheridan,
Roosevelt and McCone
Counties –

Thank You Very Much

*Truckers Acknowledge Junk Vehicle Road
Departments*

Darrell Stankey
Junk Vehicle Program Manager

The crushing crew of S&C Auto, Inc. and the State Junk Vehicle Program appreciate the efforts of employees of the Daniels, Sheridan, Roosevelt and McCone Counties for their help in getting semis and pup trailers unstuck at the various county junkyards. S&C Auto Inc. wrote, "As you are aware the weather did not cooperate in the least little bit. The county personnel were wonderful - the county employees in these counties rescued our truckers more than once pulling them out of sites... our truckers would probably still be down at the bottom of these pits..."

Disposal of Refrigerated Household Appliances

Appliance Disposal, The Proper Way

Betsy Wahl

Air Quality Enforcement Officer, EPA, Region 8, Montana Office

Since 1993, the Environmental Protection Agency (EPA) has regulated the service, maintenance and disposal of refrigerated appliances. During the service, maintenance and disposal of refrigerated household appliances, it is important to remember that the EPA prohibits the release of all ozone-depleting refrigerants, including alternative refrigerants, into the atmosphere.

Household appliances, such as refrigerators, freezers, air conditioners and dehumidifiers, use refrigerants that contain ozone-depleting CFCs (example: CFC-12 or R-12) and HCFCs (example: HCFC-22), and alternative refrigerants known as HFCs (most commonly 134a). These refrigerants are commonly referred to as "freon".

EPA requires removal of the refrigerant from appliances before disposal. The refrigerant can be removed prior to arrival at the landfill or at the landfill. At the landfill, it is important to:

- 1) obtain signed verifications that refrigerant has been recovered properly from empty refrigerators;
- 2) segregate appliances with refrigerant in the system;
- 3) recover the refrigerant from those appliances; and
- 4) properly dispose of recovered refrigerant with an EPA certified reclaimer.

The specific requirements for appliance disposal are outlined in the brochure attached to this newsletter.

Additional information on management of refrigerated household appliances can be obtained at the Stratospheric Ozone Protection website at <http://www.epa.gov/ozone> the Stratospheric Ozone Protection Hotline toll free at (800) 296-1996; or through the air quality program in the EPA Montana office at (406) 441-1123.

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management methods that are unique to each facility.

Depending on the site, a complete OMP for a Class II facility can include the following:

- (a) Business hours;
- (b) Access and traffic control;
- (c) Equipment;
- (d) Personnel;
- (e) Waste screening plan;
- (f) Fill sequence plan (excavation, compaction, cover, etc.);
- (g) Litter control;
- (h) Maintenance;
- (i) Leachate collection, monitoring, and disposal plan;
- (j) Landfill gas monitoring and remediation plan;
- (k) Groundwater monitoring plan, corrective measures assessment, and remedial action (or no-migration demo.);
- (l) Runon/runoff /erosion control plan, discharge permit, and land application plan;
- (m) Land-farming plan;
- (n) Burn permit;
- (o) Composting and special waste plans;
- (p) Confined space entry plan;
- (q) Salvaging plan; and
- (r) Notification procedures.

The OMP is a result of extensive teamwork where the operational needs of the facility are balanced with the regulatory requirements. Consistently high levels of compliance and effective regulation are facilitated by a good OMP, because it builds a framework around which consensus can develop and documents the agreements that are reached.

The EPA has included in this Newsletter an informational brochure, Protecting the Ozone Layer for your use. Please feel free to photocopy it and pass it on.

Lewis and Clark County Initiates Modified Pay-As-You-Throw Program

New System In Place

Sandra Boggs
Recycling and Marketing Development Specialist,
Pollution Prevention Bureau, DEQ

On January 1, 2001, Lewis and Clark County began a modified Pay-As-You-Throw (PAYT) Program in the Scratchgravel Solid Waste District. PAYT is attractive because it creates a direct, economic incentive for citizens and businesses to reduce the amount of waste generated, and to increase recycling and composting activities.

The District's program is modified to reduce major changes in the way participants pay for solid waste disposal, which will continue to be paid by an assessment fee through taxes. County officials hope the PAYT program will help delay further fee increases because the program will ensure that all participants are paying their fair share for waste disposal. As the program matures officials will be able to determine if fee adjustments (up or down) are warranted.

The District implemented a permit system in 1995 and started gathering the data needed to assess accurate fees for waste disposal. Will Selser, Solid Waste Manager for Lewis and Clark County, explained that a voluntary limit of two-tons per year was established at that time. Eventually the District determined that approximately 14% of permit holders dispose of more than two-tons annually. In 1999, the District paid \$124,000 to cover disposal of this extra waste.

The District's modified PAYT program has an enforceable limit of two tons annually and requires permits to be shown before access to the transfer station or landfill.

Attendants will issue a warning as the two-ton limit is approached and another warning is mailed to the property owner upon

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Litter Control, An Inspector's Interpretation

Blowing litter vs a litter problem

Andrea Vickory
Solid and Hazardous Waste Specialist, Regulatory Program

The dynamics of the solid waste business allows that blowing litter will exist. "Litter" or untidy garbage lying scattered about gives a shabby appearance of the business. One could understand why the "not in my backyard" mentality is prevalent. If we work together towards eliminating the shabby appearance, perhaps the illusion will get better.

After recently reading an article by Neal Bolton in the July/August 2000 issue of MSW Management, I thought I might address some of his highlights. Mr. Bolton's article titled Who Says You Have a Litter Problem? begs the Solid Waste Inspector for interpretation on the litter problem, so here it goes.

A good day for a Solid Waste Inspector is one when you show up on-site and the operation is being run well and it shows. A bad day is one that requires, on return to the office, a letter notifying of violations. We are all wishing for good days.

Some of the basic questions that emerge concerning blowing litter and its control are: What steps are being taken by the operator to control litter? And are signs of such behavior observed. As an Inspector, if I see signs that actions are being taken to control litter then no violation is noted. Is there a plan to control litter or is the facility just winging it? Often times the comment that it was REALLY windy out here and that we have litter pickers coming is made. Well, that may be the case, but a proper plan of control must be in place and utilized. We all know it gets windy out there. Without a plan that is effective, a violation will be noted. Has litter accumulated for awhile and if so why? Any evidence that litter has accumulated in a forgotten or out of sight area is subject to fall into being a violation. These forgotten areas promote a shabby appearance.

Finally, has litter been observed outside the landfill boundary? If so, this presents as a violation because obviously the controls are not effective and now the public and neighbors are complaining and rightfully so.

There are many ways available to help prohibit litter from blowing. These actions include plans for windy days, fences and placement of fences, shorter pushes, push as soon as dumped, and push between two larger loads to name a few.

Let's all have goods days. See you out there this spring and summer.

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exceeding the limit. Additional waste is charged at 2.4 cents per pound and invoices are mailed out after the end of the fiscal year. Unpaid invoices are placed on the property's tax notice as unpaid debt.

The District's program excludes residents in East Helena, Augusta, Lincoln and Helena. Helena hopes to implement a PAYT program in the future and the City of Lincoln has had one in place for about five years.

For more information on Lewis and Clark County's program contact Will Selser at 406-227-1189. For information on PAYT and implementing a program in your community, contact Sandra Boggs, Pollution Prevention Bureau, at 406-444-9897 or email at sboggs@state.mt.us.

Landfarm Seasonal/Annual Sampling Reports Past Due

Please Send Them In

Andrea Vickory
Solid and Hazardous Waste Specialist

Licensed soil treatment facilities are required to supply the Department with seasonal/annual sampling data for each waste source and for the below treatment zones respectively. This report should be provided to the Department no later than 90 days after the October sampling event. Seasonal sampling should be occurring three times a year April, July, and October. Annual sampling of below the treatment zone occurs in October.

The information gained in these reports allows the Department to help evaluate how effective treatment has been and if possible closure can be granted. If any problems have arisen the trend will become evident through the report review.

Your timeliness is important.

Scales Not Needed For PAYT Programs

Expense Curtailed

Sandra Boggs
Recycling and Marketing Development Specialist, Pollution Prevention Bureau, DEQ

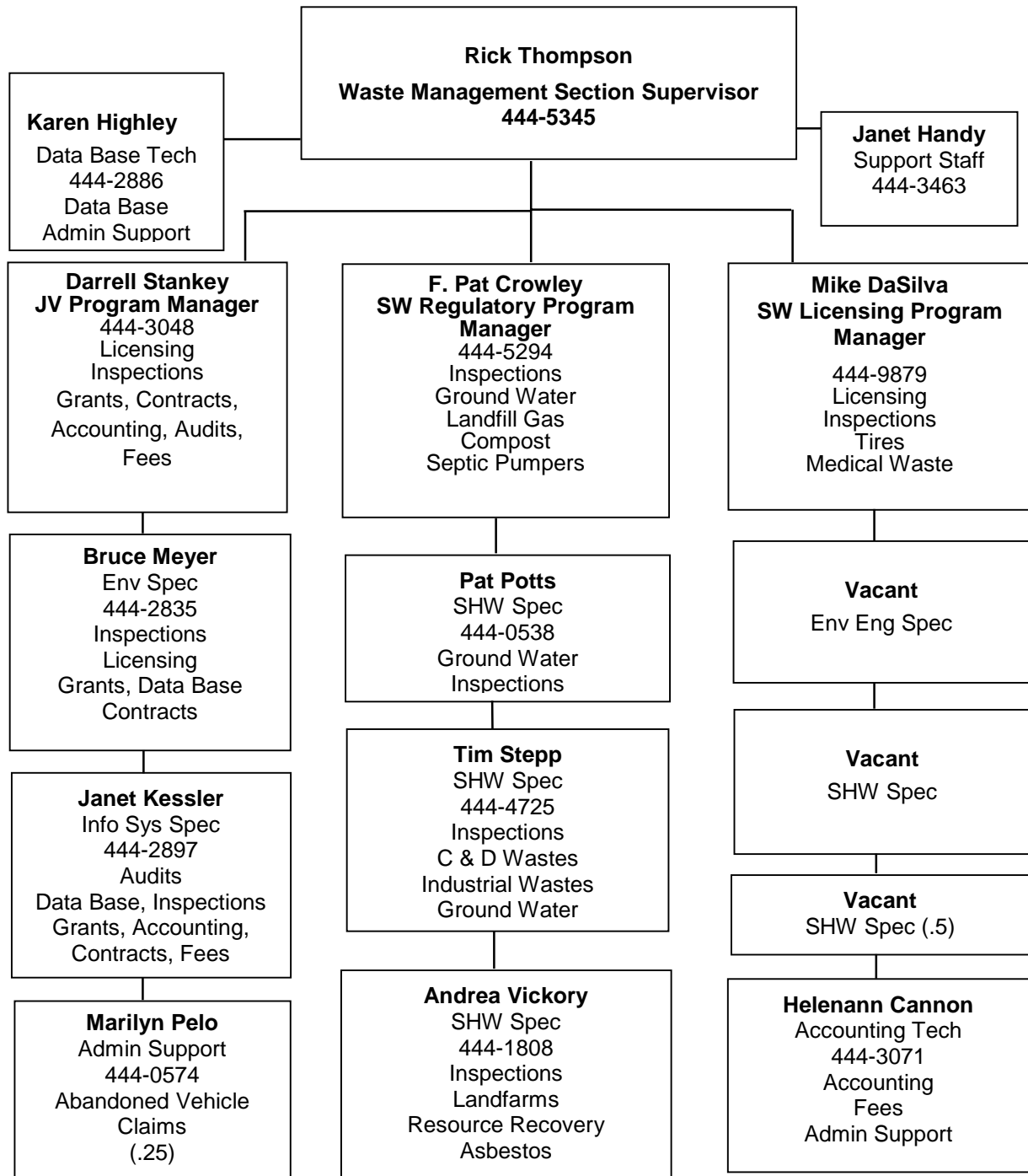
The benefit of scales to weigh waste no doubt contributed to the ability of Lewis and Clark County to accurately track tonnage per permit holder and establish baselines for beginning a PAYT program. However, other communities in Montana have successfully implemented PAYT programs without expensive scales.

Lincoln's program has been a model for other communities such as Sanders and Granite Counties. Lincoln's waste is collected at a container site and transported to Great Falls for disposal. The container site attendant uses a hand-held tri-corder to scan bar codes on cards held by users of the site. The codes contain information such as the property identification number used for tax assessment.

Tri-corders cost approximately \$1,000 at computer supply stores and are an inexpensive way for communities to gather data and charge fees based on the amount of waste disposed. Computer software packages can be purchased to assist with compiling data, generating annual disposal rates of users and determining annual fees.

Lack of scales does not prevent Lincoln from tracking the amount of waste being disposed of by individual users. The attendant uses general volume guidelines to estimate and manually enter the amount of waste per user into the tri-corder (conventional garbage can holds about .15 yard; short-bed pickup holds about 2 yards; long-bed pickup holds about 2.5 yards). In 1998, Laura Nicolai (a former employee of the Lincoln Refuse District) stated that the estimates were within about 100 cubic yards per year or equivalent to a 1% variation, as shown by the amount of waste actually deposited in the containers.

To receive a newsletter on Lincoln's PAYT program or to explore if a similar program would work in your community, call Sandra Boggs at 406-444-9897 or email at sboggs@state.mt.us. Also see PAYT in DEQ's website at: <http://www.deq.state.mt.us/ppa/p2/recycle/payt.htm>



The Department and the Montana Association of Counties (MACo) have approved the following courses for the fiscal year 2001:

- **“Hands-On Landfill Operations, Maintenance, and Safety”** training, to be conducted in Great Falls, MT, April 19 & 20;
- **“Solid Waste Regulations, Computer Issues, and Record Keeping”** training, and **“Special Waste Management for Solid Waste Management Facilities”** training, have been combined and will be conducted in the spring of 2001. Location and dates TBA.

For additional information regarding training courses please contact Rick Thompson at the DEQ, Community Services Bureau, Waste Management Section at (406) 444-5345, or Ted Lange at the MSU Extension Service, P2 Program at (406) 994-6813 or (888) 678-6872.

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